

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TRUSTEES OF THE PIPEFITTERS)
LOCAL 537 PENSION FUND, ANNUITY)
FUND and HEALTH & WELFARE)
FUND,)

Plaintiff,)

v.)

NELSON A. KING CORPORATION d/b/a)
KING CORP.,)
Defendant.)

C.A. No. 05-10371-NG

FILED
CLERK'S OFFICE
JUN 27 PM 2:28
DISTRICT COURT
DISTRICT OF MASS

ANSWER TO COMPLAINT

Defendant Nelson A. King Corporation ("King") by its attorneys Little Medeiros Kinder Bulman & Whitney, P.C., as and for its Answer to the Complaint of Plaintiffs, Trustees of the Pipefitters Local 537 Pension Fund, ("Trustees") or ("Plaintiffs"), states as follows:

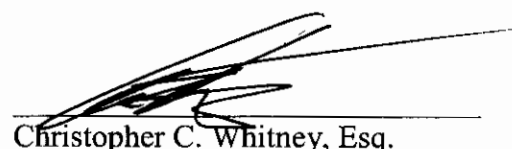
1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Complaint.
2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Complaint.
3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Complaint.
4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Complaint.
5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Complaint.
7. Admits the allegations contained in Paragraph 7 of the Complaint.
8. Admits the allegations contained in Paragraph 8 of the Complaint.
9. Admits the allegations contained in Paragraph 9 of the Complaint.
10. Admits the allegations contained in Paragraph 10 of the Complaint.
11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the Complaint, and leaves the Plaintiffs to their proof.
12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of the Complaint.

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a cognizable claim under which relief may be granted.

Respectfully submitted,
King Corp.
By its attorneys,



Christopher C. Whitney, Esq.
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Whitney, P.C.
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CERTIFICATION

I hereby certify that on the 23rd day of June I caused a true and accurate copy of the within Answer to Complaint to be mailed, first-class, postage prepaid, to Christopher N Souris, Esq., Krakow & Souris, LLC, 225 Friend Street, Boston, MA 02114.

A handwritten signature in cursive script, reading "Linda Lyette", is written over a horizontal line.

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